Premarket Notification 510(k) Section 5 – Device Description ClearPath Lower GI

510(k) Summary

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Official Contact:

Izhak Fabian - CEO

Proprietary or Trade Name:

ClearPath Lower GI

Common/Usual Name:

Irrigation/evacuation system

Classification Name/Code:

FDF – endoscope and accessories

21CFR 876.1500

Class 2

Device:

ClearPath Lower GI

Predicate Devices:

K091305 – EasyGlide – ClearPath Lower GI

K093779 - EasyGlide - ClearPath Upper Gl

Device Description:

The proposed modified ClearPath Lower Gl is one component of the predicate ClearPath (K091305) which included a number of components:

- Controller
- Tubing Set
- Irrigation set (now referred to as the ClearPath Lower GI)

We are proposing to only modify the ClearPath Lower GI which attaches to a conventional endoscope.

The ClearPath Lower GI includes one suction tube + tip, one irrigation tube + tip, and a sleeve to attach to the endoscope. The ClearPath Lower GI is connected to the ClearPath Controller and the ClearPath Tubing (K091305) and allows for irrigation and evacuation of debris from the colon during an endoscopic procedure. The device can accommodate several sizes and configurations of endoscopes with a change in the attachment ring.

Indications for Use:

The ClearPath Lower GI is intended to connect to standard colonoscopes to help facilitate intraprocedural cleaning of a poorly prepared colon by irrigating or cleaning the colon and evacuating the irrigation fluid (water), feces, and other bodily fluids and matter, e.g. blood.

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It is for use only by trained medical personnel located in hospitals, clinics, and doctors' offices.

Patient population:

Individuals undergoing endoscopic procedures.

Environment of Use:

Hospitals, clinics, and doctors' offices.

Performance Testing and Summary:

We have performed bench and animal testing to verify that the ClearPath Lower GI performs as expected in conjunction with standard endoscopes and with the cleared ClearPath controller and tubing K0910305. The tests included:

- o Dimensional testing
- o Strength testing
- o Functional testing
- o Mechanical testing
- o Compliance with endoscopes

The animal testing evaluated:

- Any sign of dislodgement of the tip from the endoscope during the procedure
- o Ease of maneuverability and advance in the colon
- o Quality of visibility
- o Quality of irrigation
- o Any sign of occlusion or interruption to continuous suction.
- o Quality of evacuation of feces and other bodily fluid and matter

All testing demonstrated that the modified ClearPath Lower GI disposable performed to its specifications and / or was equivalent to the predicate.

Summary of substantial equivalence:

We demonstrate that the modified ClearPath Lower GI is substantially equivalent to the predicates in design and performance characteristics:

• Indications – Similar to predicate K091305: Cleaning of a poorly prepared colon by irrigation and evacuation

ClearPath Lower G1

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- **Technology** Identical to predicate K091305: Single use disposable, used with a standard endoscope, works in conjunction with the ClearPath Controller (K091305) to facilitate cleaning of the colon by irrigation and evacuation.
- Environment of use Identical to predicate K091305: Hospitals, clinics, and doctors' offices.
- Materials Materials were either identical to the predicate or shown to comply with ISO 10993-1.
- **Difference** there are no substantial differences or new features in the proposed device compared to the predicates which raises any new safety or efficacy issue

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Comparative Table - Compares the predicates and the proposed modified device.

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	Proposed device		Predicate devices
	EasyGlide	K091305	K093779 EasyGlide
Device	\$	ClearPath Lower GI	ClearPath Upper GI
	-		
•	ClearPath Controller and ClearPath Tubing	ClearPath Controller and ClearPath Tubing	ClearPath Controller and ClearPath Tubing
Accessories	(K091305)	(K091305)	(K091305)
Distal tip	multi irrigation holes	multi irrigation holes	multi irrigation holes
design	Distal suction hole	Distal suction hole	Distal suction hole
Material	Comply with ISO 10993	Comply with ISO 10993	Comply with ISO 10993
	Like the predicates, the modified device was	The disposable ClearPath Lower GI was tested	As detailed in K093779 tests were performed to
	tested for compliance and performance under	with the ClearPath Controller and ClearPath	demonstrate the performance of the device under
	the working conditions as prescribed by the	Tubing (which were cleared in the same	the working conditions as prescribed by the
Performance	ClearPath Controller (K091305).	K091305. Testing demonstrated adequate	ClearPath Controller (K091305).
		functionality and performance under the working	
	Comparative animal test compared	conditions as prescribed by the ClearPath	
	functionality to that of the predicates	Controller (K091305)	
Disposable	Single patient, use, disposable	Single patient, use, disposable	Single patient, use, disposable
Packaged	Clean, non-sterile	Clean, non-sterile	Clean, non-sterile

DEPARTMENT OF HEALTH & HUMAN SERVICES



Food and Drug Administration 10903 New Hampshire Avenue Document Control Room --WO66-G609 Silver Spring, MD 20993-0002

EasyGlide Ltd. % Mr. Paul Dryden President ProMedic, Inc. 24301 Woodsage Drive BONITA SPRINGS FL 34134

MAY 1 6 2012

Re: K113050

Trade/Device Name: ClearPath Lower GI Regulation Number: 21 CFR§ 876.1500 Regulation Name: Endoscope and accessories

Regulatory Class: II Product Code: FDF Dated: April 15, 2012 Received: April 17, 2012

Dear Mr. Dryden:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical

device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Benjamin R. Fisher, Ph.D.

Director

Division of Reproductive, Gastro-Renal, and Urological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

Indications for Use Statement

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510(k) Number:

K113050 (To be assigned)

Device Name:

ClearPath Lower GI

Indications for Use:

The ClearPath Lower GI is intended to connect to standard colonoscopes to help facilitate intraprocedural cleaning of a poorly prepared colon by irrigating or cleaning the colon and evacuating the irrigation fluid (water), feces, and other bodily fluids and matter, e.g. blood.

It is for use only by trained medical personnel located in hospitals, clinics, and doctors' offices.

Prescription Use XX (Part 21 CFR 801 Subpart D)

or

Over-the-counter use ___ (21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)

Division of Reproductive, Gastro-Renal, and

Urological Devices

510(k) Number

113050